



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 3, 2020

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Lev Parnas, et al.*, S1 19 Cr. 725 (JPO)

Dear Judge Oetken:

The Government respectfully submits this letter regarding the defendants' letter motion dated November 27, 2020, which seeks, among other things, the early production of 3500 material, exhibit lists, and witness lists, and the immediate production of certain alleged *Brady* material. (Dkt. 147.) At the November 30, 2020 conference, the Government addressed these matters and also offered to respond in writing, requesting one week to do so, to which the Court agreed. However, on December 1, 2020, the defendants filed their pretrial motions, in which they raised various issues that overlap with issues raised in their November 27th letter motion.¹ For the sake of efficiency, and especially in light of the fact that the trial in this matter has been adjourned *sine die*, the Government requests permission to respond to the November 27th letter motion at the same time that the Government responds to the defendants' pretrial motions, *i.e.*, on or before December 23, 2020.²

The Government has conferred with defense counsel, and they have advised that they have no objection to this request, with the understanding that they are reserving their rights in all respects.

¹ In particular, defendant Lev Parnas devotes an entire section of his pretrial motions to arguing that the Government should "immediately" produce certain alleged *Brady* and *Giglio* material.

² To be clear, the Government is aware of its *Brady* obligations, has complied with them, and will continue to do so. Nothing herein will delay the Government from promptly disclosing additional potential *Brady* material if and when the Government becomes aware of it.

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Respectfully submitted,

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cc: All counsel of record (via ECF)